

ALTA IRRIGATION DISTRICT

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December 17, 2010

Mr. Manucher Alemi
Chief, Water Use and Efficiency Branch
Division of Statewide Integrated Water Management
Department of Water Resources
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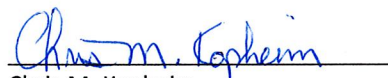
RE: Regulations that Provide for a Range of Options for Ag Water Measurement

It is important to note the time and effort that the Ag Stakeholder Group with the guidance of the Department of Water Resources took to try and understand the different means by which agricultural water is measured. In my viewpoint, the following comments would be constructive to provide a range of options for appropriate agricultural water measurement:

1. Several options have been discussed and should be included in regulations to provide flexibility necessary to accommodate diverse agricultural water conditions in California, i.e., measurement at the farm-gate, lateral measurement (measurement of delivered water at change of point of control from agency to landowner), accuracy standards based on design versus in-field and practicable quality control measures to support the implementation and maintenance of such measurement practices.
2. It is important to have agricultural water suppliers' interest and support of the process to accommodate legislative intent of appropriate agricultural water measurement.
3. Sufficient time to meet compliance requirements will be necessary. For example, a possible compliance schedule would include: 18 to 24 months to develop a water management plan; 12 months to develop, inform and implement a Proposition 218 election to fund measurement improvements; and, at least 60 months for implementation of improvements.
4. One way to encourage cooperation would be to set a design standard for accuracy at 10% to (i) reduce cost, (ii) reduce implementation timing and (iii) most likely allow for higher levels of participation.

Sincerely,

ALTA IRRIGATION DISTRICT



Chris M. Kapheim
General Manager